

# Motion to Dismiss Exhibit One



U.S. Department of Justice

*United States Attorney  
District of Arizona**Two Renaissance Square  
40 North Central Avenue Suite 1200  
Phoenix, Arizona 85004-4408**(602) 514-7500  
FAX: (602) 514-7693*

December 2, 2010

Deborah Williams, Counsel for Dennis Mahon

Re: United States v. Dennis and Daniel Mahon

Dear Ms. Williams:

Please confirm receipt of following property:

- 1 disk +1 copy of USPS Supp 1-447 excluding 40-42, 47-60

Received:

\_\_\_\_\_  
Deborah Williams\_\_\_\_\_  
Date

Sincerely

DENNIS K. BURKE  
United States Attorney  
District of Arizona

A handwritten signature in dark ink, appearing to read "John Boyle", with a long horizontal flourish extending to the right.

John Boyle  
Assistant United States Attorney

# Motion to Dismiss Exhibit Two

**Curran, John P**

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**From:** Donnelly, Terrence W  
**Sent:** Monday, November 08, 2010 9:42 AM  
**To:** Curran, John P  
**Subject:** FW:

**Attachments:** 08102009 A Scott DMI Proffer MOI.doc

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**From:** Donnelly, John D  
**Sent:** Monday, November 08, 2010 9:17 AM  
**To:** Donnelly, Terrence W  
**Subject:** RE:

Terry,

On August 10, 2009, I was proffering a fraud defendant (Alan C. Scott) in Chicago, in one of my cases. He was detained at MCC and was a cell mate for a time of Dennis Mahon. I sent a copy of the MOI to AZ, but have attached another copy. On August 21, 2009, Jim Felton and Tristan Moreland (ATF) came to Chicago and we proffered him again. Felton did the MOI. I believe this is when I charged hours to the case.

Good Luck

Jack Donnelly



08102009 A Scott  
 DMI Proffer M...

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**From:** Donnelly, Terrence W  
**Sent:** Friday, November 05, 2010 5:59 PM  
**To:** Amstone, Ryan T; Babcock, Tyler L; Balandran, Luis M; Bell, Joseph A; Boisover, Gale; Boyd, Paul D; Burritt, Candice C; Burrows, John M; Cain, Kelly E; Callahan, Christopher B - Washington, DC; Chapa, Albert; Christopher, Wylie R; Donnelly, John D; Draper, Robert D; Esteban, Patrick R; Felton, James K; Frink, Cecil A - Gary, IN; Gottfried, Andrew L; Halhcoat, Kenneth P; Hazan, Lori A; Herman, Stephanie L; Hertzler, Steven B; Higa, Ronald M - Long Beach, CA - Contractor; Hodges, Steven L; Johnson, Jeffrey G; Kirby, Sandra R; Martin, Cody C; Maskos, Mark D; Medrano, Daniel; Miller, Richard M - Dallas, TX; Morales, Carlos - OIG; Obando, Jose G; Pina, Raul A; Plumlee, Brian - OIG; Popp, Gregory J; Roels, Jeffrey C; Schubert, Jerry L - Insp Svc - Detroit, MI; Sheehan II, Richard F; Smith, Stephanie L; Werbick, Robert J; Wilkins, Chris L; Woodward Jr, Walter - Dulles, VA  
**Subject:**

Good afternoon all,

At some point during the investigation of the Scottsdale, AZ Bomb Investigation (2004- present) you logged hours on the case. Trial prep is underway and the USAO wanted me to reach out to everyone who worked on the case to confirm you are not in possession if any documents, notes, etc from the investigation.

Please get back to me at your earliest convenience with even negative responses.

Thanks,

Terry Donnelly  
 AIC Phoenix Division

# Motion to Dismiss Exhibit Three

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ANN BIRMINGHAM SCHEEL  
Acting United States Attorney  
District of Arizona

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MICHAEL T. MORRISSEY  
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UNITED STATES DISTRICT COURT  
DISTRICT OF ARIZONA

United States of America

Plaintiff,

v.

Dennis Mahon  
Daniel Mahon,

Defendants:

CR-09-00712-PHX-DGC

**GOVERNMENT'S RESPONSE  
TO MOTION TO DISMISS**

The government responds to Defendants' Motion to Dismiss, or in the Alternative to Either Preclude Witness Testimony or Continue Trial. (Docket #1336.) The government requests that the Motion be denied because the government complied with both Rule 16 and this Court's Order regarding *Jencks* disclosures. Moreover, Defendants' assertions that Alan Scott's testimony is a surprise are false because the government disclosed Alan Scott reports in 2010.

**Dennis Mahon's Oral Statement**

Defendants' Motion to Dismiss is predicated on the alleged late disclosure of Alan Scott's interview with law enforcement. Alan Scott's statements were disclosed in compliance with this Court's Order regarding *Jencks*, and disclosure was not required by Rule 16.

Rule 16 (a)(1)(A) of the Federal Rules of Criminal Procedure states:

Defendant's Oral Statement. Upon a defendant's request, the government must disclose to the defendant the substance of any relevant oral statement made by the defendant, before or after arrest, *in response to interrogation by a person the defendant knew was a government agent* if the government intends to use the statement at trial.

1 (Emphasis added.)<sup>1/</sup>

2 The government does not have a Rule 16 duty to disclose the Alan Scott report. This Court  
3 has not ordered, and could not compel, disclosure under this Rule. "The district court's  
4 discovery order violates Rule 16(a)(1)(A) to the extent it compels disclosure of oral statements  
5 made by Hoffman not in response to interrogation by a person known to be a government agent."  
6 United States v. Hoffman, 794 F.2d 1429, 1433 (9<sup>th</sup> Cir. 1986). The Court in Hoffman noted  
7 that "such witness's statements are not discoverable except in accordance with the *Jencks* Act."  
8 Hoffman, at 1433 (citing United States v. Walk, 533 F.2d 417, 418-20 (9<sup>th</sup> Cir.1975)). This  
9 Court's Case Management Orders (12 and 13) required the disclosure of *Jencks* material by  
10 December 2, 2011. The government complied with the Court's Order and disclosed *Jencks*  
11 material as required.

12 This Court has already ruled on Defendants' statements in regard to Crawford v.  
13 Washington, 541 U.S. 36 (2004) and Bruton v. United States, 391 U.S. 123 (1968). (See Docket  
14 #1300.) The testimony of Alan Scott will reflect statements regarding Dennis Mahon's conduct.  
15 The government will direct the testimony so that statements concerning Daniel Mahon will not  
16 be elicited.

17 **False Statements within Defendants' Motion**

18 Defendants<sup>2/</sup> request this Court dismiss this case due to "absolute and irreparable prejudice  
19 to Daniel Mahon." (Motion, Page 4, Line 18 and Page 8, Lines 8-9.) Defendants assert that the  
20 government "conceal(ed) the Scott statements until December 2, 2011" and "the government  
21 disclosed for the first time purported statements of Dennis Mahon dating from July of 2009."  
22 (Motion at Page 4, Line 18 and Page 5, Lines 1-3.) Defendants assert that the government's  
23

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24 <sup>1/</sup> Defendants failed to cite this obvious adverse authority in their Motion. The United  
25 States respectfully asserts that defense counsel is required to cite this adverse authority. See  
26 Golden Eagle Distributing Corp. v. Burroughs Corp., 809 F.2d 584, 588 (9<sup>th</sup> Cir. 1987)(noting  
duties to cite adverse authority and avoid baseless claims).

27 <sup>2/</sup> Dennis Mahon joined Defendant Daniel Mahon's Motion. (See Docket #1338.)

1 conduct “violates due process,” “engages in hide-the-ball tactics,” and “creates prejudicial  
2 surprise.” (Motion, at Page 7, Lines 8-9; Page 8, Line 1; Page 5, Line 22.) In sum, Defendants  
3 ask this Court to sanction the government with the most extreme remedy available “because this  
4 late disclosure opens an entirely new and previously undisclosed line of investigation for which  
5 Daniel Mahon has no more pretrial time with which to adequately prepare.” (Motion, Page 8,  
6 Lines 15-17.)

7 Defendants’ allegations are stunningly false. On December 2, 2010, over one year ago, the  
8 government disclosed to the defense two reports and 10 pages of notes regarding the two Alan  
9 Scott interviews. First, the government disclosed to the defense a three-page Postal Service  
10 Memorandum of Interview of Alan Scott. (Bates “USPS Supp” 40-42.) This report was written  
11 by Postal Inspectors Donnelly and Freeman, and concerned the first proffer of Scott on August  
12 10, 2009. Second, the government also disclosed a second draft report regarding Alan Scott  
13 written by Postal Inspector Felton. (Bates “USPS Supp” 47-49.) This report summarized an  
14 August 28, 2009 interview between Scott, Inspector Felton, and Special Agent Moreland.  
15 <sup>3/</sup> Third, the government further disclosed 10 pages of notes of the August 28 interview of Scott.  
16 (Bates “USPS Supp” 50-59.) <sup>4/</sup>

17 The reports and notes disclosed in 2010 contain all of Dennis Mahon’s statements that  
18 Defendants’ allege were recently disclosed. Stated differently, there is no new material  
19 information in the December 2, 2011 disclosure. Defendants’ Motion alleges that statements by  
20 Alan Scott are “entirely new and previously undisclosed.” (Motion, Page 5, Lines 13-14.) All  
21 of the statements Defendants allege are newly disclosed were included in the 2010 discovery.

22 Defendants statements are perhaps attributable to oversight except for the fact that defense  
23 counsel emailed the government and co-counsel regarding these exact Postal reports and notes.  
24 Defense counsel requested all interviews and the proffer agreement for Scott, and defense

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25 <sup>3/</sup> The August 28, 2009 interview is also summarized in ROI 308. This report was  
26 authored by Special Agent Moreland, and disclosed to the defense on December 2, 2011.

27 <sup>4/</sup> The reports, note, and email will be filed separately under seal.



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1 counsel referred the government to the "USPS Supp" section containing these reports. The  
2 specific page noted by the defense explicitly refers to the 2010 Scott proffer. Defense counsel's  
3 email was sent to government counsel on December 8, 2011, four days before Defendants filed  
4 and joined the Motion to Dismiss. All counsel were copied on this December 8, 2011 email. This  
5 email would appear to prove that Defendants were well aware of Alan Scott's statements for  
6 over a year.

7 The government is the first to acknowledge that errors and oversights occur during a case  
8 of this size. Attorneys make mistakes and occasionally fail to meet deadlines. Defendants'  
9 Motion to Dismiss, however, fails at any standard of fair advocacy. Ultimately, the government  
10 cannot reconcile the government's disclosure and Defendant's December 8 email with the  
11 numerous allegations contained within Defendants' Motion to Dismiss. In addition, this is not  
12 first instance where Defendants have unfairly described the status of disclosure in this case.<sup>5/</sup>  
13 Defendants' Motion to Dismiss is inaccurate, frivolous, and a waste of this Court's time. If  
14 similar inaccurate pleadings are filed during trial, they will continue to waste the time of the  
15 Court, jury, and counsel.

16  
17 Respectfully submitted this 14<sup>th</sup> day of December, 2011.

18  
19 ANN BIRMINGHAM SCHEEL  
20 Acting United States Attorney  
21 District of Arizona

22 s/ John Boyle  
23 JOHN BOYLE  
24 Assistant U.S. Attorney

25 <sup>5/</sup> See Docket #1246 and #1257. Defendants filed a Notice pleading with the Court  
26 asserting that government misconduct of withholding evidence could require future motions.  
27 The government responded that Defendants failed to inform the Court that Defendants had  
28 received written reports regarding that evidence and that the defense had actually viewed the  
evidence they claimed was withheld. The Court did not inquire into the matter further because  
Defendants' Notice did not require a decision from the Court.

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1 CERTIFICATE OF SERVICE

2 I hereby certify that on December 14, 2011, I electronically transmitted the attached document  
3 to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of  
Electronic Filing to the following CM/ECF registrants:

4 Deborah L. Williams, Attorney for Dennis Mahon  
5 Barbara L. Hull, Attorney for Daniel Mahon

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# Motion to Dismiss Exhibit Four

U.S. Department of Justice  
Bureau of Alcohol, Tobacco, Firearms and Explosives

## Report of Investigation

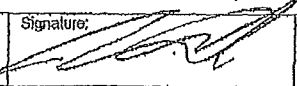
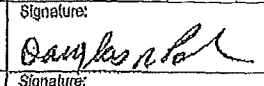
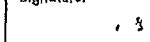
Title of Investigation: Logan Bombing	Investigation Number: 785080-Q4-0012	Report Number: 308
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### SUMMARY OF EVENT:

Interviews of Cooperating Defendant Alan C. Scott regarding information gained by Scott during his incarceration with suspect Dennis MAHON in the Metropolitan Correctional Center, Chicago, Illinois.

### NARRATIVE:

1. On August 10, 2009, United States Postal Inspector's John Donnelly and Kevin Freeman interviewed Alan C. Scott, a cooperating defendant. This interview took place at the United States Attorney's Office, 219 S. Dearborn Street, Chicago, Illinois. Assistant United States Attorney (AUSA) Nathalina Hudson was also present during the interview. The following information derived from the initial interview of Scott was provided to Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) Special Agent (SA) Tristan Moreland by Inspector Donnelly.
2. A proffer interview was conducted with Alan C. Scott relative to an investigation into mail and wire fraud schemes involving Scott's sale of items on eBay and his failure to deliver the items. Also present was Scott's attorney, David Schippers. Prior to the interview Scott and Schippers were provided a standard proffer letter from the United States Attorney and Schippers reviewed it with Scott. Scott advised that he wished to provide the government with information he obtained relative to an individual named Dennis Mahon who is currently being held in custody for sending a package bomb that detonated in Arizona. Subject to the proffer agreement Scott related the following.
3. Scott has been incarcerated at the Metropolitan Correctional Center (MCC) Chicago since his arrest on mail fraud charges on March 27, 2009. Scott had been providing information to certain BOP officers at the MCC relative to criminal conduct going on in the MCC. Scott provided information relative to a shiv (makeshift prison knife) being hidden on his floor which led to the search of the tier for the shiv by guards. The guards did not find the shiv possibly because one of the guards may have tipped off the search. The guards placed Scott in segregation for his protection. While in segregation Scott was incarcerated in cell 1102 from about June 19, 2009 to July 10, 2009.
4. On about July 2, 2009, Scott was assigned a new roommate who told Scott his name was Dennis Mahon. Mahon told Scott that people called him Bill. When Scott asked Mahon what he was in for

Prepared by: Tristan Moreland	Title: Special Agent, Phoenix V (Arson) Field Office	Signature: 	Date: 9/3/09
Authorized by: Douglas R. Palmer	Title: Group Supervisor, Phoenix V (Arson) Field Office	Signature: 	Date: 9/3/09
Second level reviewer (optional): William D. Newell	Title: Special Agent in Charge, Phoenix Field Division	Signature: 	Date: 

Title of Investigation: Logan Bombing	Investigation Number: 180-04-0012	Report Number: 308
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he said that he was in for making bombs and that he was the Phoenix bomber. Scott and Mahon were the only two held in cell 1102 until Scott was moved out on July 10, 2009. During the course of their time held together the two had several conversations in which Mahon disclosed information about himself and his activities, including the following.

5. Dennis and his brother Dan were both charged. They lived at 5794 North Backwoods Road, Davis Junction, IL 61020. His cell phone number was 815-393-4626. Dennis provided Scott with this address information on a piece of paper that Scott still had in his locker. Scott will give any papers he has from Mahon to his attorney who will provide them to the government.
6. Mahon said that he was a former Grand Dragon of the Ku Klux Klan in Missouri. Mahon was part of a group or faction he referred to as the "third position." Mahon told Scott that he was a friend of white supremacist Tom Metzger. Mahon explained that he had butted heads with Metzger because he wanted to take the organization more communist and Metzger was against that.
7. Mahon described the raid on his home in Davis Junction by agents and told Scott that he was going to fight it out with agents. Mahon said that he was on the phone with Metzger when he was in the standoff with agents and that Metzger convinced him to surrender to agents. Mahon had a cut on his ear, and when Scott asked about it Mahon told Scott that when agents were trying to take him in custody he had a knife up to his ear, and that led to the cut.
8. Scott recalled that Mahon said that in 2004, or 2005, he was in Phoenix, Arizona and was with a woman. This woman, whose name was not given by Mahon, introduced him to a man from Europe. Mahon told Scott the name of the individual but Scott could not presently recall the name. Scott believed that the name might have started with a "G". Mahon told Scott that this man was a protestant and had recently been released from prison in the United Kingdom for blowing up a building. Both Dennis and Dan met this man and wanted to impress him so they decided to blow up the Diversity Office.
9. Mahon told Scott that the bomb was sent to the Diversity Office as a payback. Mahon explained to Scott that the city fired three white police officers who had done something wrong to some minorities. Mahon said somebody blew the whistle, which led to the firings. Mahon said that he made and mailed the bomb (Scott clarified this during the August 28 interview by stating that Mahon said he sent the bomb.) Mahon said that it was a package bomb and that the bomb was contained in a box. Mahon said that when a guy opened the box it went boom, but it only blew off three of his fingers.
10. Mahon said that he and his brother went to Phoenix in an RV and that after the bombing they had to get out of town quickly. Mahon told Scott that they drove to Tulsa, Oklahoma and met up with a white supremacist named Harrington. Mahon told Scott that Harrington helped out the Mahons and he helped him by letting him live with them. It was not clarified at the time of this interview whether when Scott said, "he helped them by letting him live with them," Scott meant that Mahon helped Harrington by letting Harrington live with the Mahons, or Harrington helped the Mahons by letting the Mahons live with Harrington's group. Mahon said that this was where they met up with Alicia Stubb or Stubbs, who Mahon said was a CI for the ATF.
11. Mahon told Scott that he used a book(s) to make the Phoenix bomb. Mahon told Scott that he knew Timothy McVeigh; the Oklahoma City bomber. Mahon told Scott that he had sold McVeigh some

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guns and books. Mahon told Scott that he sold McVeigh "The Anarchist's Cookbook" and the "Poor Man's James Bond." Mahon told Scott that he used the same book that he sold to McVeigh to make the Phoenix bomb.

12. Scott said that Mahon wanted to help out his brother and was thinking of admitting to the whole thing to help his brother. Scott said that Mahon said he was only charged with conspiracy, not the actual bombing, and was only looking at three years. It was not clarified at the time of this interview whether when Scott said "he" Scott was referring to Dennis or Dan Mahon being charged with conspiracy.
13. Mahon also told Scott about a photo he and his brother posted on the internet of him and his brother in front of a Ryder truck. They did this to mess with the FBI.
14. On August 28, 2009, ATF SA Tristan Moreland conducted a follow-up interview with Alan C. Scott. Also present during this interview was United States Postal Inspectors James Felton and John Donnelly as well as AUSA Nathalina Hudson. The following is a summary of that interview.
15. On August 28, 2009, Alan Scott was interviewed at the United States Attorney's Office in Chicago, IL. Present during the interview were Alcohol Tobacco, Firearms and Explosives (ATF) Special Agent Tristan Moreland, Postal Inspectors James Felton and John Donnelly, and Assistant United States Attorney (AUSA) Nathalina Hudson. Alan Scott is incarcerated at the Metropolitan Correctional Center (MCC) in Chicago, IL for charges stemming from a mail fraud scheme investigated by the U.S. Postal Inspection Service. Mr. Scott agreed to provide information regarding a mail bomb investigation unrelated to any charges pending against him.
16. Mr. Scott stated that while incarcerated at MCC he shared a cell with an individual he came to know as Dennis Mahon. Mr. Scott said he and Mahon shared a cell (in the hole) for approximately 11 days in June-July 2009. Mr. Scott advised that on the first day he met Dennis Mahon he asked him "What did you do?" Mr. Scott said that Dennis told him that he couldn't talk about it but when Scott stated he (Dennis) must be incarcerated for touching kids, Mahon said he was in for conspiracy to make a bomb.
17. Mr. Scott stated that he and Dennis Mahon found they had an interest in military history in common and that is how they began talking about bombs. Mr. Scott said that Dennis told him he had known Tim McVeigh and that he (Dennis) was the number 3 anonymous person in the Oklahoma City bombing investigation. Mr. Scott advised Dennis told him he and his brother (Daniel) had taken a photo posing with a Rider truck and placed it on the internet. Dennis Mahon told Mr. Scott that the photo was the cause of a fight between he (Dennis) and Tom Metzger.
18. Mr. Scott said Dennis told him he had 150 Federal agents at his house to arrest him and that he was going to take out his AK-47 and shoot it out. Mr. Scott related Dennis said at the time of the arrest he was on the phone with Tom Metzger and asked Metzger what to do regarding the standoff with the police. Dennis said that Metzger told him not to shoot it out and that "we will get you out of this." Mr. Scott said Dennis told him he got into the white supremacist movement while working for an airline in Florida. Mr. Scott said Dennis' brother Daniel may have been working for Eastern Airlines at the time.
19. Mr. Scott related Dennis Mahon's account of the riots in Florida in the early 1980's while he (Dennis) was in the National Guard. Mr. Scott advised Dennis Mahon told him that during the riots he was able to open up and shoot people and that he doesn't know how many he shot. Mr. Scott said Dennis told him he met Tim



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McVeigh at a gun show when he sold McVeigh books to include The Poor Man's James Bond, and the Anarchist Handbook.

20. Mr. Scott advised Dennis talked about his home in Davis Junction, IL, describing the area. Ms. Scott said Dennis told him the cops didn't find everything during the search warrant executed on the property, that they only found a couple books and small guns. Mr. Scott advised Dennis said there were 2-3 more weapons that were not found. Mr. Scott said Dennis described an area where he and his brother Daniel hid as children where additional illegal items were hidden. Ms. Scott advised Dennis mentioned that the area was so well hidden that he and Daniel had run away from home as children for over a day, hiding in this spot and were not found despite a police search. Mr. Scott said Dennis told him the hiding spot was over a hill near a retention ditch or storm water basin.
21. Mr. Scott said Dennis told him that while in Tulsa, OK Dennis and Daniel met an individual known to them as "Harrington" who was an associate of Tom Metzger and who was on the run or wanted. Dennis stated that Harrington moved in with them in Tulsa for period of time. Dennis indicated to Scott that Harrington was associated with another bombing.
22. Mr. Scott advised Dennis also discussed meeting an individual who was allegedly a convicted bomber from England or Ireland. This person, whom Scott could not recall his name, was accompanied by a female whose name may have started with a "G." Scott recalled Dennis saying that this female use to date white supremacist Bill White and that her father was once in the CIA. Mr. Scott said Dennis told him there were bands at the event where they met and that both Dennis and Daniel wanted to show this person that they knew what they were doing, and wanted to impress him with their ability to blow things up.
23. Mr. Scott related Dennis spoke about the bombing in Arizona relating that three white police were fired and somebody had to protect the rights of the white men. Mr. Scott advised Dennis told him the Diversity Officer was blown up because he (the Diversity Officer) was the focal point of getting these white cops fired. Mr. Scott said Dennis told him he himself built the bomb, and that he learned how from books and the internet and that it was his first amendment right to do so. Mr. Scott stated Dennis told him that a black guy only lost 2 or 3 fingers, and that he doesn't know what the big deal is. Mr. Scott said Dennis told him he (Dennis) sent the bomb from Litchfield or Litchfield Park. Mr. Scott advised that Dennis told him that Litchfield Park is a nice area and nobody would expect someone like Dennis to be there. Mr. Scott said Dennis told him that he and Daniel drove their Recreational Vehicle (RV) from Litchfield Park to Oklahoma. Mr. Scott stated Dennis told him he (Dennis) left after the bomb exploded, that the Governor of AZ began a "stop hate" campaign, and he and Daniel drove the RV to Tulsa, OK. Mr. Scott stated Dennis told him a person can make a bomb out of things that can be bought at a hardware store and that he was able to construct the bomb from normal everyday things he got from his farm. Mr. Scott said Dennis mentioned fertilizer could be mixed with other things to construct a bomb.
24. Mr. Scott said he remembers when Dennis first told him about his involvement with the bomb, that Dennis told him about it on the 4<sup>th</sup> of July. Mr. Scott stated he and Dennis were in their cell, that the lights had been turned off at 10:30pm and they heard the fireworks going off in Chicago. Mr. Scott said he remembers that when the lights went off Dennis put his mattress on the floor and he (Scott) was on the lower bunk.
25. Mr. Scott advised Dennis told him while in Tulsa they met Harrington, that he stayed with the Mahons while he was on the run from the law. Mr. Scott said Dennis told him Tom Metzger or White instructed Dennis to help Harrington, to hide him out and that is why they stopped in Tulsa.

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Report Number:  
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26. Mr. Scott stated Dennis told him he and Daniel met the CI in Tulsa, when they stopped to help her fix a flat tire. Mr. Scott advised Dennis told him that as they got to know the CI she tried to get him to make a bomb to hurt her x-husband or x-boyfriend. SA Moreland asked Mr. Scott if he recognized the name "Becca" and he responded no. Mr. Scott was asked if Dennis mentioned a newspaper article, "Drunk Times" and Scott responded no. SA Moreland asked Mr. Scott if Dennis mentioned anything about Tom Metzger and Scott replied that Dennis told him Metzger was "the leader", "the boss", the "top dog" and that all the money they didn't need to live on went to "the church" a reference to Metzger's organization. SA Moreland asked Mr. Scott if Dennis ever mentioned the term "WAR" or "White Aryan Resistance" and Scott said he was not sure, that Dennis was always worried about being overheard. SA Moreland asked Mr. Scott if Dennis ever mentioned knowing an individual in Missouri and Scott said no. SA Moreland asked Mr. Scott if he recognized the name Steve Waddell and Scott said he did but does not remember how it came up or what Dennis said about Waddell. SA Moreland asked Mr. Scott if he recognized the name John McLaughlin and Scott said Dennis told him McLaughlin was a machine gun supplier who received a light sentence of three years. Mr. Scott said Dennis told him he thought McLaughlin was an informant, a "Benedict Arnold".
27. Mr. Scott said Dennis told him Daniel is shyer than Dennis, that he (Dennis) would follow Daniel around on his jobs with the airline, and that is how they ended up in Florida. Mr. Scott advised Dennis told him he felt bad about involving his brother (in the bombing case) that he felt like he dragged Daniel into it. Mr. Scott stated Dennis told him he believed Daniel would get out of jail on bond and would then contact Tom Metzger to arrange a legal team. Mr. Scott said Dennis told him Daniel would bond out; buy a pre paid phone from Wal-Mart to contact Metzger, because they didn't want to use the house phone. Mr. Scott said Dennis told him Daniel and Metzger would get together a big defense team that would get he and Daniel off. Mr. Scott stated Dennis said his 89 year old father had money in a safe deposit box, over \$100,000.00 and would use the money to build a defense team based on Metzger's advice.
28. Mr. Scott said Dennis told him he had been arrested and subsequently deported from Canada, that they tried to charge him with trying to overthrow the government. SA Moreland asked Dennis about several subjects; whether Dennis mentioned "Heritage Front", "abortion clinic", "God City", "Andy (Andreas) Strassmeir (sp)", and "Tommy Gun" and to each Scott replied no.
29. Mr. Scott said he is sure about the name Harrington, that he uses word association to remember names and used Joey Harrington the football player to remember the name Harrington.
30. SA Moreland asked Mr. Scott if Dennis ever mentioned the Archangel Michael and Scott said he and Dennis used to pray together, that Dennis would read scripture. Mr. Scott said Dennis would always read from the passage regarding the Archangel Michael and highlighted passages in the bible. Mr. Scott stated he gave Dennis the bible and described it as having a faded bluish cover on it, but did not know if Dennis got it out of MCC.



There is no Page 6 to ROI 308

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**Subject:** FW: US v. Alan C. Scott CR-2009-00295-1

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**From:** Hudson, Nathalina (USAILN)  
**Sent:** Friday, December 02, 2011 11:13 AM  
**To:** Karmgard, Melody (USAAZ)  
**Cc:** Morrissey, Mike (USAAZ)  
**Subject:** RE: US v. Alan C. Scott CR-2009-00295-1

The case number is 08 CR 652. There was no plea agreement. Scott entered a blind plea.

MINUTE entry before the Honorable Joan B. Gottschall as to Alan C Scott(1); Change of plea hearing held. Defendant enters plea of guilty to Count One and Eight of Superseding Indictment. Finding of guilty entered. Order presentence investigation report. Sentencing memoranda and/or objections to psr due by 1/6/11. Responses by 1/13/11. Sentencing set for 1/19/11 at 2:00PM. No sentencing memoranda or objections to presentence reports or responses will be considered if filed out of time unless a motion to file late is made no less than one week prior to the date set for sentencing. No sentencing hearing will be continued unless the courtroom deputy is notified of the need to change in writing at least one week (7 days) prior to the date set for sentencing. Failure to comply with this standing order will result in counsel being sanctioned in the amount of \$100.00 which shall be paid to the Clerk of Court, 219 S. Dearborn, 20th floor, Chicago, Illinois 60604. Same bond to stand. No written agreement. Mailed notice (yap, ) (Entered: 09/28/2010)

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FILED 8/11

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

APR 23 2009

MAGISTRATE JUDGE  
GERALDINE SOAT BROWN  
UNITED STATES DISTRICT COURT

UNITED STATES OF AMERICA

No. 08 CR 652

v.

Violations: Title 18, United  
States Code, Sections 1341,  
1343 and 3147

JUDGE GOTTSCHALL

ALAN C. SCOTT

SUPERSEDING INDICTMENT

COUNT ONE

MAGISTRATE JUDGE MASON

The SPECIAL FEBRUARY 2008-2 GRAND JURY charges:

1. At times material to this indictment:

a. eBay.com ("eBay") was an Internet auction site on which computer users could mass-advertise items for sale by the process of auction. eBay required users to register with eBay by providing a name, address, e-mail address and telephone number prior to conducting transactions. eBay users selected a "User ID" during the registration process which identified the user to other eBay users during auctions.

b. When an individual registered with eBay via the Internet, eBay transmitted the identifying information utilized to establish the eBay account by wire from the user's location to eBay's collection of computer servers for processing, data storage and future use. eBay's computer servers were contained within an Internet data center in California. Thereafter, any information communicated to eBay over its website, including registration information submitted by a user, was directed via wire to eBay's computer servers in California.

c. After registration, a seller was able to transmit information via computer to the eBay website describing the property for sale and inviting bids on the item. Prospective buyers

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submitted bids on the items by transmitting information about the amount of the bid via computer to the eBay website. The highest bidder was typically deemed the winner of the auction, and once the winning bidder was determined, the seller of the item and the bidder communicated with each other by e-mail or telephone to arrange shipment of and payment for the item. Payment options used by eBay sellers and buyers included personal check, wire transfer, money order, cashier's check, credit card or PayPal.

d. PayPal was a company owned by eBay which served as an intermediary between buyers and sellers for transmitting payment on auctioned items. PayPal allowed an eBay user to set up an account in order to avoid providing a check or credit card number to an unknown seller. Under this service, an eBay user provided PayPal with a credit card number or bank account number. PayPal then charged the buyer's PayPal account and remitted the proceeds to the seller's PayPal account. Any information communicated to PayPal by computer was also directed via wire to eBay's computer servers in California.

e. As part of the eBay registration process, all eBay users had to agree to comply with eBay's User Agreement. The User Agreement described the terms under which eBay offered users access to its online services. In the User Agreement, eBay specified various "restricted activities" from which all eBay users agreed to refrain. eBay listed a seller's failure to deliver items purchased from the seller as one of the restricted items. eBay notified its users that any eBay user who did not agree to abide by the User Agreement restrictions was not permitted to use the auction services on eBay's Internet site and that, if a user was found in violation of an eBay policy, the user could be removed from the site.

f. After eBay removed an account from its site as a result of fraud or other

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misconduct by a user, eBay would take steps to preclude the individual from registering and opening another eBay account.

g. Defendant ALAN C. SCOTT was a resident of Illinois. SCOTT maintained accounts in Illinois in his own true name at J.P. Morgan Chase Bank NA ("Chase Bank"), as well as accounts at Chase Bank held jointly in his own name and the names of various purported business entities.

2. Between approximately November 2004 and December 2008, in the Northern District of Illinois, Eastern Division, and elsewhere,

ALAN C. SCOTT,

defendant herein, devised and intended to devise, and participated in, a scheme and artifice to defraud and to obtain money by means of materially false and fraudulent pretenses, representations and promises in connection with items offered for sale through eBay Internet auction sites, which scheme is further described below.

3. It was part of the scheme that, between November 2004 and December 2008, defendant ALAN C. SCOTT registered with eBay to open at least approximately 54 different accounts with user names which included ALLIECAT10000, VIDEOKING123, TOOLSHOP 13, dogtags101, rubyslipper10, and SMSMOORE. SCOTT used aliases and false addresses when registering with eBay to open these accounts. SCOTT provided multiple false names and addresses to eBay when registering in order to prevent eBay from cross-referencing and thereby determining that he was associated with the accounts.

4. It was further part of the scheme that SCOTT initially offered low price items for sale under an account or user name and accepted bids on the items. SCOTT provided the winning

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bidders with the items in order to establish a record of satisfied customers under the account name.

5. It was further part of the scheme that, once the account or user name received a satisfactory rating, SCOTT offered higher priced items for bidding. SCOTT, using the false name under which he had opened the account, notified individuals that they had placed the winning bid and arranged for the winning bidder to send payment to a specified location or through PayPal to a specified account.

6. It was further part of the scheme that, after receiving payment from the winning bidder, SCOTT did not send the item to the winning bidder.

7. It was further part of the scheme that, after bidders complained to eBay that they had not received the items for which they had paid and eBay closed the account, SCOTT opened new accounts with eBay using a different user name supported by false names and addresses and began the process again to establish a satisfactory rating before collecting money without sending out the item for which a winning bidder had paid.

8. It was further part of the scheme that SCOTT's sales through the approximately 54 different eBay accounts which he opened and caused to be opened exceeded approximately \$211,510.

9. It was further part of the scheme that SCOTT opened approximately 23 different accounts at Chase Bank in his own name and in the names of various purported business entities for use in connection with one or more of the eBay accounts SCOTT had opened.

10. It was further part of the scheme that SCOTT opened and caused to be opened mail boxes at UPS facilities at various locations in Illinois, Wisconsin, Indiana and New Mexico, in order

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to receive the payments from the winning bidders.

11. It was further part of the scheme that, on or about January 27, 2005, SCOTT opened Account No. 689469096 at Chase Bank in his own name.

12. It was further part of the scheme that, on or about February 10, 2005, SCOTT opened Account No. 641776695 at Chase Bank in his own name and the name of "Midwestern Maintenance Company."

ALLIECAT10000 (Victims A and B)

13. It was further part of the scheme that, on or about June 7, 2007, SCOTT opened and caused an eBay account to be opened in the user name "ALLIECAT10000" and registered the account using a false name and address.

14. It was further part of the scheme that, on or about July 7, 2007, SCOTT rented mail box PMB 242 at a UPS Store located at 4710 Lincoln Highway, Matteson, Illinois. SCOTT received mail at that location in the names of "Midwestern Maintenance Supply" and "AM Supply," among other names of purported business entities.

15. It was further part of the scheme that, between on or about July 12, 2007, and on or about July 22, 2007, SCOTT sold or caused to be sold approximately 49 items totaling approximately \$20,776 using the ALLIECAT10000 account on eBay.

16. It was further part of the scheme that, between on or about July 14, 2007, and on or about July 20, 2007, Victim A purchased through auction a total of four rare coins from ALLIECAT10000 on eBay for the total price of approximately \$880.49.

17. It was further part of the scheme that, based on directions provided by SCOTT using the ALLIECAT10000 account on eBay, Victim A obtained three money orders made payable to



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"AM Supplies" and mailed the money orders to AM Supplies at 4710 Lincoln Highway, PMB #242, Matteson, Illinois 60443.

18. It was further part of the scheme that, on or about July 20, 2007, Victim B purchased through auction a rare coin from ALLIECAT10000 on eBay for the price of approximately \$188.00.

19. It was further part of the scheme that, based on directions provided by SCOTT using the ALLIECAT10000 account on eBay, Victim B obtained a money order in the amount of \$199.59 made payable to "AM Supplies" and mailed the money order to AM Supplies at 4710 Lincoln Highway, PMB 242, Matteson, Illinois 60443.

20. It was further part of the scheme that, between on or about July 23, 2007, and on or about July 30, 2007, SCOTT deposited and caused to be deposited three of Victim A's money orders and Victim B's money order into Account No. 641776695 at Chase Bank.

21. It was further part of the scheme that SCOTT never sent Victims A and B the rare coins that they had purchased from him on eBay.

22. It was further part of the scheme that, on or about July 24, 2007, eBay suspended the ALLIECAT10000 account.

VIDEOKING123 (Victim C)

23. It was further part of the scheme that, on or about November 8, 2007, SCOTT opened and caused an eBay account to be opened in the user name "VIDEOKING123," and registered the account using a false name and address.

24. It was further part of the scheme that, on or about October 25, 2007, SCOTT rented Box 301 at a UPS Store located at 6300 Kingery Highway, Willowbrook, Illinois. SCOTT received mail at that location in the names of "Suncoast Tile Supply" and "Video King" among other names



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of purported individuals and business entities.

25. It was further part of the scheme that, between on or about January 6, 2008, and on or about January 21, 2008, SCOTT sold or caused to be sold approximately 131 items totaling approximately \$12,254 using the VIDEOKING123 account on eBay.

26. It was further part of the scheme that on or about January 14, 2008, Victim C purchased through auction a rare coin from VIDEOKING123 on eBay for a price of approximately \$894.07.

27. It was further part of the scheme that, based on directions provided by SCOTT using the VIDEOKING123 account on eBay, Victim C prepared a personal check in the amount of approximately \$903.02 made payable to "Linda Miller" and mailed the check to Video King at 6300 Kingery Highway, Suite 416-301, Willowbrook, Illinois 60527.

28. It was further part of the scheme that, on or about January 17, 2008, SCOTT deposited and caused to be deposited Victim C's check into Account No. 641776695 at Chase Bank.

29. It was further part of the scheme that SCOTT never sent Victim C the rare coin that Victim C had purchased from him on eBay.

30. It was further part of the scheme that, on or about February 1, 2008, eBay suspended the VIDEOKING123 account.

**TOOLSHOP13 (Victims D and E)**

31. It was further part of the scheme that, on or about November 9, 2007, SCOTT opened and caused an eBay account to be opened in the user name "TOOLSHOP 13" and registered the account using a false name and address.

32. It was further part of the scheme that, on or about January 17, 2008, SCOTT caused

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an individual ("Individual A") to rent a mail box 171 in Individual A's name at a UPS Store located at 3015 East New York Avenue, Aurora, Illinois.

33. It was further part of the scheme that, between on or about February 17, 2008, and on or about February 23, 2008, SCOTT sold or caused to be sold approximately 134 items totaling approximately \$18,552 using the TOOLSHOP 13 account on eBay.

34. It was further part of the scheme that, on or about March 10, 2008, Victim D purchased through auction a saw from TOOLSHOP13 on eBay for a price of approximately \$117.50.

35. It was further part of the scheme that, based on directions provided by SCOTT using the TOOLSHOP13 account on eBay, Victim D obtained a money order in the amount of approximately \$129.75 made payable to "Sally Bailey" and mailed the money order to The Tool Shop, 3015 East New York Street, Suite A2-171, Aurora, Illinois 60504.

36. It was further part of the scheme that, on or about March 10, 2008, Victim E purchased through auction a tool set from TOOLSHOP13 on eBay for a price of approximately \$404.00.

37. It was further part of the scheme that, based on directions provided by SCOTT using the TOOLSHOP13 account on eBay, Victim E obtained a money order in the amount of approximately \$413.00 made payable to "Sally Bailey" and mailed the money order to Suncoast Tile, 6300 Kingery Highway, 416-301, Willowbrook, Illinois 60527.

38. It was further part of the scheme that, between on or about March 17, 2008 and on or about March 28, 2008, SCOTT deposited and caused to be deposited the money orders from Victims D and E into Account No. 689469096 at Chase Bank.

39. It was further part of the scheme that SCOTT never sent Victims D and E the items

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that they had purchased from him on eBay.

40. It was further part of the scheme that, on or about March 23, 2008, eBay suspended the TOOLSHOP13 account.

SMSMOORE (Victims F and G)

41. It was further part of the scheme that, on or about March 10, 2008, SCOTT opened and caused an eBay account to be opened in the user name "SMSMOORE" and registered the account using a false name and address.

42. It was further part of the scheme that, beginning on or about March 31, 2008, SCOTT sold or caused to be sold at least approximately 445 items using the SMSMOORE account on eBay.

43. It was further part of the scheme that, on or about April 14, 2008, Victim F purchased through auction a drill from SMSMOORE on eBay for a price of approximately \$92.00.

44. It was further part of the scheme that, Victim F authorized the payment of approximately \$92.00 through Victim F's PayPal account to a PayPal account SCOTT had earlier established using a false name on the account.

45. It was further part of the scheme that, on or about April 14, 2008, after SCOTT's PayPal account had been credited with the approximately \$92.00 received from Victim F, SCOTT authorized PayPal to send via wire transfer approximately \$300 to an account in SCOTT's name at Chase Bank.

46. It was further part of the scheme that, on or about June 7, 2008, Victim G purchased through auction a Naval uniform with medals for "Sub" Chief from SMSMOORE on eBay for a price of approximately \$104.00.

47. It was further part of the scheme that, based on directions provided by SCOTT using

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the SMSMOORE account on eBay, Victim G obtained a money order in the amount of approximately \$119.50 made payable to "Austin Scott" and mailed the money order to Suncoast Tile, 6300 Kingery Highway, Suite 416-301, Willowbrook, Illinois 60527.

48. It was further part of the scheme that, on or about June 13, 2008, SCOTT deposited and caused to be deposited the money order from Victim G into Account No. 689469096 at Chase Bank.

49. It was further part of the scheme that SCOTT never sent Victims F and G the items that Victims F and G had purchased from him on eBay.

**DOGTAGS101 (Victim H)**

50. It was further part of the scheme that on or about November 16, 2008, SCOTT caused an individual ("Individual B") to open an eBay account in the user name "dogtags101" and registered to Individual B.

51. It was further part of the scheme that SCOTT caused Individual B to set up the "dogtags101" account so that eBay users who purchased items from dogtags101 would send their payments to Individual B's home address.

52. It was further part of the scheme that SCOTT caused Individual B to set up a PayPal account, which was linked to Individual B's National City Bank account.

53. It was further part of the scheme that, beginning on or about November 16, 2008, SCOTT caused Individual B to list military uniforms and medals for sale on eBay.

54. It was further part of the scheme that on or about December 2, 2008, Victim H agreed over email to purchase a military uniform, ribbons, and medals for a price of approximately \$913.00.

55. It was further part of the scheme that Victim H obtained a money order in the amount

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of \$913.00 made payable to Individual B and mailed the money order to Individual B's home address.

56. It was further part of the scheme that SCOTT caused Individual B to cash Victim H's money order through Individual B's bank account at National City and give the proceeds from the money order, totaling approximately \$913, to SCOTT.

57. It was further part of the scheme that SCOTT failed to send Victim H two of approximately 13 items that Victim H purchased from SCOTT.

58. It was further part of the scheme that SCOTT misrepresented, concealed and hid, and caused to be misrepresented, concealed and hidden, the purposes of and acts done in furtherance of the aforementioned scheme.

59. On or about July 23, 2007, at Matteson, in the Northern District of Illinois, and elsewhere,

ALAN C. SCOTT,

defendant herein, for the purpose of executing the aforesaid scheme to defraud, knowingly caused to be delivered by United States Mail, according to the directions thereon, an envelope addressed to AM Supplies, 4710 Lincoln Highway, PMB # 242, Matteson, IL 60443, which contained two money orders made payable to AM Supplies, in the total amount of approximately \$470.44, which represented payment to SCOTT for items that Victim A had agreed to purchase from the ALLIECAT10000 account on eBay;

In violation of Title 18, United States Code, Section 1341.

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COUNT TWO

The SPECIAL FEBRUARY 2008-2 GRAND JURY further charges:

1. The Grand Jury realleges and incorporates by reference the allegations in paragraphs 1-58 of Count One of this indictment.

2. On or about July 30, 2007, at Matteson, in the Northern District of Illinois, and elsewhere,

ALAN C. SCOTT,

defendant herein, for the purpose of executing the aforesaid scheme to defraud, knowingly caused to be delivered by United States Mail, according to the directions thereon, an envelope addressed to AM Supplies, 4710 Lincoln Highway, PMB 242, Matteson, IL 60443, which envelope contained a money order made payable to AM Supplies, in the amount of approximately \$199.59, which represented payment to SCOTT for an item that Victim B had agreed to purchase from the ALLIECAT10000 account on eBay;

In violation of Title 18, United States Code, Section 1341.

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COUNT THREE

The SPECIAL FEBRUARY 2008-2 GRAND JURY further charges:

1. The Grand Jury realleges and incorporates by reference the allegations in paragraphs 1-58 of Count One of this indictment.

2. On or about January 17, 2008, at Willowbrook, in the Northern District of Illinois, and elsewhere,

ALAN C. SCOTT,

defendant herein, for the purpose of executing the aforesaid scheme to defraud, knowingly caused to be delivered by United States Mail, according to the directions thereon, an envelope addressed to Video King, 6300 Kingery Highway, Suite 416-301, Willowbrook, IL 60527, which envelope contained a check made payable to Linda Miller, in the amount of approximately \$903.02, which represented payment to SCOTT for an item that Victim C had agreed to purchase from the VIDEOKING123 account on eBay;

In violation of Title 18, United States Code, Section 1341.



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COUNT FOUR

The SPECIAL FEBRUARY 2008-2 GRAND JURY further charges:

1. The Grand Jury realleges and incorporates by reference the allegations in paragraphs 1-58 of Count One of this indictment.

2. On or about March 25, 2008, at Aurora, in the Northern District of Illinois, and elsewhere,

ALAN C. SCOTT,

defendant herein, for the purpose of executing the aforesaid scheme to defraud, knowingly caused to be delivered by United States Mail, according to the directions thereon, an envelope addressed to The Tool Shop, 3014 East New York Street, Suite A2-171, Aurora, IL 60504, which envelope contained a money order made payable to Sally Bailey, in the amount of approximately \$129.75, which represented payment to SCOTT for an item that Victim D had agreed to purchase from the TOOLSHOP13 account on eBay;

In violation of Title 18, United States Code, Section 1341.



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COUNT FIVE

The SPECIAL FEBRUARY 2008-2 GRAND JURY further charges:

1. The Grand Jury realleges and incorporates by reference the allegations in paragraphs 1-58 of Count One of this indictment.

2. On or about March 17, 2008, at Willowbrook, in the Northern District of Illinois, and elsewhere,

ALAN C. SCOTT,

defendant herein, for the purpose of executing the aforesaid scheme to defraud, knowingly caused to be delivered by United States Mail, according to the directions thereon, an envelope addressed to Suncoast Tile, 6300 Kingery Highway, 416-301, Willowbrook, IL 60527, which envelope contained a money order made payable to Sally Bailey, in the amount of approximately \$413.00, which represented payment to SCOTT for an item that Victim E had agreed to purchase from the TOOLSHOP13 account on eBay;

In violation of Title 18, United States Code, Section 1341.

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**COUNT SIX**

The SPECIAL FEBRUARY 2008-2 GRAND JURY further charges:

1. The Grand Jury realleges and incorporates by reference the allegations in paragraphs 1-58 of Count One of this indictment.

2. On or about April 14, 2008, at Homewood, in the Northern District of Illinois, and elsewhere,

ALAN C. SCOTT,

defendant herein, for the purpose of executing the aforesaid scheme, and attempting to do so, did knowingly cause to be transmitted in interstate commerce between Homewood, Illinois and California, certain writings, signs, and signals, namely, a direction from Victim F to transfer funds from Victim F's PayPal account for the purchase of an item from the TOOLSHOP13 account on eBay;

In violation of Title 18, United States Code, Section 1343.

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COUNT SEVEN

The SPECIAL FEBRUARY 2008-2 GRAND JURY further charges:

1. The Grand Jury realleges and incorporates by reference the allegations in paragraphs 1-58 of Count One of this indictment.

2. On or about June 13, 2008, at Willowbrook, in the Northern District of Illinois, and elsewhere,

ALAN C. SCOTT,

defendant herein, for the purpose of executing the aforesaid scheme to defraud, knowingly caused to be delivered by United States Mail, according to the directions thereon, an envelope addressed to Suncoast Tile, 6300 Kingery Highway, 416-301, Willowbrook, IL 60527, which envelope contained a money order made payable to Austin Scott, in the amount of approximately \$119.50, which represented payment to SCOTT for an item that Victim G had agreed to purchase from the SMSMOORE account on eBay;

In violation of Title 18, United States Code, Section 1341.

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**COUNT EIGHT**

The SPECIAL FEBRUARY 2008-2 GRAND JURY further charges:

1. The Grand Jury realleges and incorporates by reference the allegations in paragraphs 1-58 of Count One of this indictment.

2. On or about December 11, 2008, at DuPage County, in the Northern District of Illinois, and elsewhere,

ALAN C. SCOTT,

defendant herein, for the purpose of executing the aforesaid scheme to defraud, knowingly caused to be delivered by United States Mail, according to the directions thereon, an envelope addressed to Individual B, which envelope contained a money order made payable to Individual B, in the amount of approximately \$913.00, which represented payment to SCOTT for an item that Victim H had agreed to purchase from the dogtags101 account on eBay;

In violation of Title 18, United States Code, Section 1341;

and,

ALAN C. SCOTT,

defendant herein, committed this offense while on release pursuant to Title 18, United States Code,

Chapter 207;

In violation of Title 18, United States Code, Section 3147.

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**FORFEITURE ALLEGATION**

The SPECIAL FEBRUARY 2008-2 GRAND JURY further charges:

1. The allegations contained in Counts One through Eight of this Indictment are incorporated herein by reference for the purpose of alleging that certain property is subject to forfeiture pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

2. As a result of his violation of Title 18, United States Code, Sections 1341, 1343 and 1512(b)(3), as alleged in the foregoing Indictment,

ALAN C. SCOTT,

defendant herein, shall forfeit to the United States, pursuant to Title 18 United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), any and all right, title and interest in property, real and personal, which constitutes and is derived from proceeds traceable to the charged offenses.

3. The interests of the defendant subject to forfeiture pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c) include, but are not limited to approximately \$90,000.

4. If any of the property subject to forfeiture and described above, as a result of any act or omission of the defendant:

- (a) Cannot be located upon the exercise of due diligence;
- (b) Has been transferred or sold to, or deposited with, a third party;
- (c) Has been placed beyond the jurisdiction of the Court;
- (d) Has been substantially diminished in value; or

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(e) Has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property, under the provisions of Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

All pursuant to Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

A TRUE BILL:

FOREPERSON

UNITED STATES ATTORNEY

# Motion to Dismiss Exhibit Five



Mahon  
Barbara Hull  
to:  
Morrissey, Mike \(\USAAZ\), Boyle, John \(\USAAZ\)  
12/07/2011 07:32 AM  
Cc:  
"Deborah Williams", "Milagros Cisneros"  
Show Details

Please provide the transcript of the plea colloquy of Alan Scott at your earliest opportunity. Thank you.

Barbara L. Hull  
Attorney at Law  
(623) 465-1705  
[blhull@q.com](mailto:blhull@q.com)

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# Motion to Dismiss Exhibit Six



**Fw: Mahon - Scott**  
**Deborah Williams** to: deborah\_williams

12/14/2011 04:24 PM

Deb (via BB)  
Deborah Williams

----- Original Message -----

**From:** Deborah Williams  
**Sent:** 12/08/2011 03:51 PM CST  
**To:** "Michael Morrissey" <Mike.Morrissey@usdoj.gov>; "John Boyle" <john.boyle@usdoj.gov>; Milagros Cisneros; "Barbara Hull" <blhull@q.com>  
**Subject:** Mahon - Scott

We are requesting all interviews with and the proffer agreement for Alan Scott, including the 8/10/09 (Donnelly) and 8/21/09 (Felton) postal MOIs. See USPS Supp00043.

This is a Brady request. See US v Brady (9th Cir).

Thank you.  
Deb (via BB)

# Motion to Dismiss Exhibit Seven

**MEMORANDUM OF INTERVIEW**

PERSON INTERVIEWED : Alan C. Scott

DATE OF INTERVIEW : August 10, 2009

PLACE OF INTERVIEW : USAO  
219 S. Dearborn Street  
Chicago, IL

TIME OF INTERVIEW : 2:25 p.m. to 2:45 p.m.

INTERVIEWED BY : John Donnelly  
Postal Inspector

Kevin Freeman  
Postal Inspector

Nathalina Hudson  
Assistant United States Attorney

A proffer interview was conducted with Alan C. Scott relative to an investigation into mail and wire fraud schemes involving Scott's sale of items on eBay and his failure to deliver the items. Also present was Scott's attorney, David Schippers. Prior to the interview Scott and Schippers were provided a standard proffer letter from the United States Attorney and Schippers reviewed it with Scott. Scott advised that he wished to provide the government with information he obtained relative to an individual named Dennis Mahon who is currently being held in custody for sending a mail bomb that detonated in Arizona. Subject to the proffer agreement Scott related the following.

Scott has been incarcerated at the MCC Chicago since his arrest on mail fraud charges on March 27, 2009. Scott had been providing information to the certain BOP officers at the MCC relative to criminal conduct going on in the MCC. Scott provided information relative to a shiv (makeshift prison knife) being hidden on his floor which led to the search of the tier for the shiv by guards. The guards did not find the shiv because one of the guards may have tipped off the search. The guards placed Scott in segregation for his protection. While in segregation Scott was incarcerated in cell 1102 from about June 19, 2009 to July 10, 2009.

On about July 2, 2009, Scott was assigned a new roommate who told Scott his name was Dennis Mahon. Mahon told Scott that people called him Bill. When Scott asked Mahon what he was in for he said that he was in for making bombs and that he was the Phoenix bomber. Scott and Mahon were the only two held in cell 1102 until Scott was moved out on July 10, 2009. During the course of their time held together the two had several conversations in which Mahon disclosed information about himself and his activities, including the following.

Dennis and his brother Dan were both charged. They lived at 5794 North Backwoods Road, Davis Junction, IL 61020. His cell phone number was 815-393-4626. Dennis

provided Scott with this address information on a piece of paper that Scott still had in his locker. Scott will give any papers he has from Mahon to his attorney who will provide them to the government.

Mahon said that Mahon was a Grand Dragon of the Ku Klux Klan in Missouri. Mahon was part of a group or faction he referred to as the "third position." Mahon told Scott that he was a friend of white supremacist Tom Metzger. Mahon explained that he had butted heads with Metzger because he wanted to take the organization more communist and Metzger was against that.

Mahon described the raid on his home in Davis Junction by agents and told Scott that he was going to fight it out with agents. Mahon said that he was on the phone with Metzger when he was in the standoff with agents and that Metzger convinced him to surrender to agents. Mahon had a cut on his ear, and when Scott asked about it Mahon told Scott that when agents were trying to take him in custody he had a knife up to his ear, and that led to the cut.

Scott recalled that Mahon said that in 2004, or 2005, he was in Phoenix, Arizona and was with a woman. This woman, whose name was not given by Mahon, introduced him to a man from Europe. Mahon told Scott the name of the individual but Scott could not presently recall the name. Scott believed that the name might have started with a "G". Mahon told Scott that this man was a protestant and had recently been released from prison in the United Kingdom for blowing up a building. Both Dennis and Dan met this man and wanted to impress him so they decided to blow up the Diversity Office.

Mahon told Scott that the bomb was sent to the Diversity Office as a payoff. Mahon explained to Scott that the city fired three white police officers who had done something wrong to some minorities. Mahon said somebody blew the whistle, which led to the firings. Mahon said that he made and mailed the bomb. Mahon said that it was a package bomb and that the bomb was contained in a box. Mahon said that when a guy opened the box it went boom, but it only blew off three of his fingers.

Mahon said that he and his brother went to Phoenix in an RV and that after the bombing they had to get out of town quickly. Mahon told Scott that they drove to Tulsa, Oklahoma and met up with a white supremacist named Harrington. Mahon told Scott that Harrington helped out the Mahons and he helped him by letting him live with them. It was not clarified at the time of this interview whether when Scott said, "he helped them by letting him live with them," Scott meant that Mahon helped Harrington by letting Harrington live with the Mahons, or Harrington helped the Mahons by letting the Mahons live with Harrington's group. Mahon said that this was where they met up with Alicia Stubb or Stubbs, who Mahon said was a CI for the ATF.

Mahon told Scott that he used a book(s) to make the Phoenix bomb. Mahon told Scott that he knew Timothy McVeigh; the Oklahoma City bomber. Mahon told Scott that he had sold McVeigh some guns and books. Mahon told Scott that he sold McVeigh "The Anarchist's Cookbook" and the "Poor Man's James Bond." Mahon told Scott that he used the same book that he sold to McVeigh to make the Phoenix bomb.

Scott said that Mahon wanted to help out his brother and was thinking of admitting to the whole thing to help his brother. Scott said that Mahon said he was only charged with conspiracy, not the actual bombing, and was only looking at three years. It was not

clarified at the time of this interview whether when Scott said "he" Scott was referring to Dennis or Dan Mahon being charged with conspiracy.

Mahon also told Scott about a photo he and his brother posted on the internet of him and his brother in front of a Ryder truck. They did this to mess with the FBI.

John Donnelly  
Postal Inspector

Kevin Freeman  
Postal Inspector

## DRAFT/Felton

On August 28, 2009, Alan Scott was interviewed at the United States Attorney's Office in Chicago, IL. Present during the interview were Alcohol Tobacco, Firearms and Explosives (ATF) Special Agent Tristan Moreland, Postal Inspectors James Felton and John Donnelly, and Assistant United States Attorney (AUSA) Nathalina Hudson. Alan Scott is incarcerated at the Metropolitan Correctional Center (MCC) in Chicago, IL for charges stemming from a mail fraud scheme investigated by the U.S. Postal Inspection Service. Mr. Scott agreed to provide information regarding a mail bomb investigation unrelated to any charges pending against him.

Mr. Scott stated that while incarcerated at MCC he shared a cell with an individual he came to know as Dennis Mahon. Mr. Scott said he and Mahon shared a cell (in the hole) for approximately 11 days in June-July 2009. Mr. Scott advised that on the first day he met Dennis Mahon he asked him "What did you do?" Mr. Scott said that Dennis told him that he couldn't talk about it but when Scott stated he (Dennis) must be incarcerated for touching kids, Mahon said he was in for conspiracy to make a bomb. Mr. Scott stated that he and Dennis Mahon found they had an interest in military history in common and that is how they began talking about bombs. Mr. Scott said that Dennis told him he had known Tim McVeigh and that he (Dennis) was the number 3 anonymous person in the Oklahoma City bombing investigation. Mr. Scott advised Dennis told him he and his brother (Daniel) had taken a photo posing with a Rider truck and placed it on the Internet. Dennis Mahon told Mr. Scott that the photo was the cause of a fight between he (Dennis) and Tom Metzger. Mr. Scott said that Dennis told him that Metzger was the leader of the white supremacist movement. Scott said Dennis told him that Metzger was angry that Mahon drew attention to himself.

Mr. Scott said Dennis told him he had 150 Federal agents at his house to arrest him and that he was going to take out his AK-47 and shoot it out. Mr. Scott related Dennis said at the time of the arrest he was on the phone with Tom Metzger and asked Metzger what to do regarding the standoff with the police. Dennis said that Metzger told him not to shoot it out and that "we will get you out of this." Mr. Scott said Dennis told him he got into the white supremacist movement while working for an airline in Florida. Mr. Scott said Dennis' brother Daniel may have been working for Eastern Airlines at the time. Mr. Scott related Dennis Mahon's account of the riots in Florida in the early 1980's while he (Dennis) was in the National Guard. Mr. Scott advised Dennis Mahon told him that during the riots he was able to open up and shoot people and that he doesn't know how many he shot. Mr. Scott said Dennis told him he met Tim McVeigh at a gun show when he sold McVeigh books to include The Poor Man's James Bond, and the Anarchist Handbook.

Mr. Scott advised Dennis talked about his home in Davis Junction, IL, describing the area. Ms. Scott said Dennis told him the cops didn't find everything during the search warrant executed on the property, that they only found a couple books and small guns. Mr. Scott advised Dennis said there were 2-3 more weapons that were not found. Mr. Scott said Dennis described an area where he and his brother Daniel hid as children where additional illegal items were hidden. Ms. Scott advised Dennis mentioned that the area was so well hidden that he and Daniel had run away from home as children for over a day, hiding in this spot and were not found despite a police search. Mr. Scott said Dennis told him the hiding spot was over a hill near a retention ditch or storm water basin.



Mr. Scott said Dennis told him that while in Tulsa, OK Dennis and Daniel met an individual known to them as "Harrington" who was an associate of Tom Metzger and who was on the run or wanted. Dennis stated that Harrington moved in with them in Tulsa for period of time. Dennis indicated to Scott that Harrington was associated with another bombing.

Mr. Scott advised Dennis also discussed meeting an individual who was allegedly a convicted bomber from England or Ireland. This person, whom Scott could not recall his name, was accompanied by a female whose name may have started with a "G." Scott recalled Dennis saying that this female use to date white supremacist Bill White and that her father was once in the CIA. Mr. Scott said Dennis told him there were bands at the event where they met and that both Dennis and Daniel wanted to show this person that they knew what they were doing, and wanted to impress him with their ability to blow things up.

Mr. Scott related Dennis spoke about the bombing in Arizona relating that three white police were fired and somebody had to protect the rights of the white men. Mr. Scott advised Dennis told him the Diversity Officer was blown up because he (the Diversity Officer) was the focal point of getting these white cops fired. Mr. Scott said Dennis told him he himself built the bomb, and that he learned how from books and the internet and that it was his first amendment right to do so. Mr. Scott stated Dennis told him that a black guy only lost 2 or 3 fingers, and that he doesn't know what the big deal is. Mr. Scott said Dennis told him he (Dennis) sent the bomb from Litchfield or Litchfield Park. Mr. Scott advised that Dennis told him that Litchfield Park is a nice area and nobody would expect someone like Dennis to be there. Mr. Scott said Dennis told him that he and Daniel drove their Recreational Vehicle (RV) from Litchfield Park to Oklahoma. Mr. Scott stated Dennis told him he (Dennis) left after the bomb exploded, that the Governor of AZ began a "stop hate" campaign, and he and Daniel drove the RV to Tulsa, OK. Mr. Scott stated Dennis told him a person can make a bomb out of things that can be bought at a hardware store and that he was able to construct the bomb from normal everyday things he got from his farm. Mr. Scott said Dennis mentioned fertilizer could be mixed with other things to construct a bomb.

Mr. Scott said he remembers when Dennis first told him about his involvement with the bomb, that Dennis told him about it on the 4<sup>th</sup> of July. Mr. Scott stated he and Dennis were in their cell, that the lights had been turned off at 10:30pm and they heard the fireworks going off in Chicago. Mr. Scott said he remembers that when the lights went off Dennis put his mattress on the floor and he (Scott) was on the lower bunk. Mr. Scott advised Dennis told him while in Tulsa they met Harrington, that he stayed with the Mahons while he was on the run from the law. Mr. Scott said Dennis told him Tom Metzger or White instructed Dennis to help Harrington, to hide him out and that is why they stopped in Tulsa.

Mr. Scott stated Dennis told him he and Daniel met the CI in Tulsa, when they stopped to help her fix a flat tire. Mr. Scott advised Dennis told him that as they got to know the CI she tried to get him to make a bomb to hurt her x-husband or x-boyfriend. SA Moreland asked Mr. Scott if he recognized the name "Becca" and he responded no. Mr. Scott was asked if Dennis mentioned a newspaper article, "Drunk Times" and Scott responded no. SA Moreland asked Mr. Scott if Dennis mentioned anything about Tom Metzger and Scott replied that Dennis told him Metzger was "the leader", "the boss", the

"top dog" and that all the money they didn't need to live on went to "the church" a reference to Metzger's organization. SA Moreland asked Mr. Scott if Dennis ever mentioned the term "WAR" or "White Aryan Resistance" and Scott said he was not sure, that Dennis was always worried about being overheard. SA Moreland asked Mr. Scott if Dennis ever mentioned knowing an individual in Missouri and Scott said no. SA Moreland asked Mr. Scott if he recognized the name Steve Waddell and Scott said he did but does not remember how it came up or what Dennis said about Waddell. SA Moreland asked Mr. Scott if he recognized the name John McLaughlin and Scott said Dennis told him McLaughlin was a machine gun supplier who received a light sentence of three years. Mr. Scott said Dennis told him he thought McLaughlin was an informant, a "Benedict Arnold".

Mr. Scott said Dennis told him Daniel is shyer than Dennis, that he (Dennis) would follow Daniel around on his jobs with the airline, that is how they ended up in Florida. Mr. Scott advised Dennis told him he felt bad about involving his brother (in the bombing case) that he felt like he dragged Daniel into it. Mr. Scott stated Dennis told him he believed Daniel would get out of jail on bond and would then contact Tom Metzger to arrange a legal team. Mr. Scott said Dennis told him Daniel would bond out; buy a pre paid phone from Wal-Mart to contact Metzger, because they didn't want to use the house phone. Mr. Scott said Dennis told him Daniel and Metzger would get together a big defense team that would get he and Daniel off. Mr. Scott stated Dennis said his 89 year old father had money in a safe deposit box, over \$100,000.00 and would use the money to build a defense team based on Metzger's advice.

Mr. Scott said Dennis told him he had been arrested and subsequently deported from Canada, that they tried to charge him with trying to overthrow the government. SA Moreland asked Dennis about several subjects; whether Dennis mentioned "Heritage Front", "abortion clinic", "God City", "Andy (Andreas) Strassmeir(sp)", and "Tommy Gun" and to each Scott replied no.

Mr. Scott said he is sure about the name Harrington, that he uses word association to remember names and used Joey Harrington the football player to remember the name Harrington.

SA Moreland asked Mr. Scott if Dennis ever mentioned the Archangel Michael and Scott said he and Dennis used to pray together, that Dennis would read scripture. Mr. Scott said Dennis would always read from the passage regarding the Archangel Michael and highlighted passages in the bible. Mr. Scott stated he gave Dennis the bible that it had a faded bluish cover on it but he does not know if Dennis got it out of MCC.

①

8-28-09 0910 S/ Scott, Alan A/R +  
 USAO Chicago Felton, Maryland, Donnelly

Stole 76,000 - mail fraud - about 3 yr plea -  
 I'm guilty

1st day: I asked DM "What did you do?"

DM - I can't talk about it

AS - Then you must be in here for truck kids

DM - No - conspiracy to make bomb.

We had interest in military history in common  
 that is how we got talking about bombs.

Said he knew Tim McVeah - said he  
 was the #3 anonymous person in OK bombing.  
 My bro + I took photo of Richer truck +  
 put on internet.

150. Feel at my house - I was going to take  
 out my AK + shoot at out.

I was on phone w/ Tim Metzger  
 "Said position in Klan which was TM  
 group D  
 Said position - Klan - Metzger"

you got into white supremacist while  
 walking for our airline in Fla +  
 Bro may have been waiting for

Feltan/McDonald/Donnelly

②

JK+ St. Scott, Alan 8-25-09

started KKK activity while working for  
cuisine - putting things on windshields

Rights in Fla. - he was mall guard -  
early 80's -

Harrington  
John McLaughlin

Member of "3rd Position"

Metzger started 3rd Position

He had argument w/ TM re: Klem v  
Communism - this was early - late 80's

DM said during riots he handed canteens  
to women in apt. bldg who threw down a  
rope & he feels they put poison in it  
& then retaliated - DM was in Mall Guard  
said he was able to just open up &  
shoot people - doesn't know how many  
he shot

Met McVeigh at gun show - sold him  
books - got even books - Poor Mens J.B.  
Cheapest Cookbook.

DM said #3 anonymous person in bombing

(3)

Fitter/McCord/Dawson/ly

JRF S/Scott, Alan 8-25-09

got into argument w/ Metzger over  
take photo w/ Rider truck.

Argued w/ Metz over taking KKK  
toward communism

Davis Junctions - place they could hide  
as kids (described areas)

Only found a couple books, small guns,  
didn't find chills,  
said he had 5-6 weapons & w/ found 2-3

DM severed ties w/ KKK over communism

DM never discussed blowing up IRS bldg

In Tulsa DM let "Harrington" bomb maker  
move in w/ them - Harrington moved in w/  
DM & boy in an RV - This was after  
DM got out of DMX

blow up churches bldg - try to impress  
"G" - met w/ IRA guy from England  
bomber from Ireland - DM's were  
try to impress Harrington



Feltz/Morlan/Donnelly

(4)

JKT S/Scott, Alan 8-20-09

Met Harrington at white supremacist event in PHX.

Also woman who had some type of relat. to Bill White (another bomber).

Said they were bombs at this event -  
National Socialists - DM & DM -  
wanted to show Harrington they knew  
what they were doing - wanted to  
impress this guy w/ their ability &  
blow this up3 white police - fired -  
saw they were trying to pin bombs  
on himsimply had to protect the rights of  
white menDistrict Officer was blown up bec he  
was focal point of getting these  
white cops firedDM said he himself built bomb -  
Knowledge from books & internet  
1st amendment rightsaid you can make a bomb out of  
things bought at hardware store

USPSupp-000053

Feltan/McCord/Dannelly

⑤

S/Scott, Alan JK + 8-28-09

he said he was able to construct bomb  
from normal everyday things he got  
from farm

→ fertilizer mixed w/ other things

He said he mailed the bomb

Bro only involvement is that he was in  
room w/ GJ who wanted to  
make bomb to

Black guy only lost 2-3 fingers - doesn't  
know what the big deal is  
Mailed bomb from Litchfield in  
Litchfield park.

DM told me "he mailed it" +  
left it at that

DM said he was in Litchfield Park -  
nice area - wouldn't expect me to  
be there.

From F.P. they drove it in RV to  
Oklahoma.



(6)

Feltou / Morland / Deanerly

S/Scott, Alan JKT 8-28-08

I think DM left after bomb exploded -  
Governor began a stop hate campaign.

both DM drove to OK in RV.

stopped in Tulsa - met Harrington -  
he lived w/ DM's, he was on the  
run from law - assoc. w/ Metzger

Metzger a White told DM to help  
Harrington - to hide him out. That is why  
they stopped in Tulsa - met the CI  
in Tulsa - CI had flat tire - helped  
her - got to know her - she tried to get  
him to make bomb to hurt X's  
to husband or X boyfriend.

Did not recognize name "Becca"

? Did DM mention newspaper article? Drunk  
Times? - no - don't remember that.

DM said Metzger knew all about the bombing  
in 2004?

said TM was "the body", "the boss", the  
"top dog" - said all the \$ they didn't  
need to live on went to "the church"

(7)

Feltor/McAulard/Donnell

JK7 S/Scott, Alan 8-28-09

? did term "WAR on Whity Byn Res" come up - I'm not sure - he was worried about being overheard.

? did DM mention a guy in Missouri?  
No

? Steve Wadfell - yes, but I don't remember how it came up or what he told me

? John McLaughlin - DM said he was a machine gun supplier & got a light sentence of 3 yrs & felt he was an informant "Benedict Arnold"

Said his brother is more shy than him - he would follow his bro around on his jobs w/ airline - that he had good job & plenty of \$ - that is how they hooked up in Fla.  
Said he felt bad about involving his bro -

said his bro was only in room w/ CI when they talked about keeping the X husband - like he dragged his brother into it.

John Saunders like his brother

Fitter / Mueller / Donnelly  
(8/10/07) S/Scott, Alan JKT 8-28-09

really involved but only his source  
of financial support.

DM told me on 4<sup>th</sup> of July he made  
bomb that blew guys fingers off in  
→ Scottsdale.

There were fireworks going off in Chicago.  
they turned lights off at 10:30 PM -  
put mattress on floor - I was on  
lower bunk.

Thought Daniel would get out on bond  
• then he could contact Metzger  
• arrange legal team.

Daniel will bond out  
He could buy a track phone from  
Wal-Mart - get a new # cell  
phone

didn't want to use the house phone -

? did he use term "track phone"

No that came from me - he used  
pre paid phone from Wal-Mart

⑧ ⑨ JKT

Father / Mother / Daughter

JKT 9/Scott A 8-28-09

This bro could do all the legwork  
for him

He could get a hold of Metzger  
+ get together a big defense team  
who can get us off.

89 years old Father has \$ in  
safe deposit box - > 100,000

Use money to build defense team based on  
Metzger's advice.

On phone w/ Metzger at arrest asking  
what he should do - shoot self -  
fight etc.

Metzger told him to give up, that  
they would get them off

"What should I do, I want to shoot  
them off - Metzger said no, give  
yourself up, - we will get you out"

Called Metzger bec. I didn't know what  
to do, to kill self - to shoot it out -

3M

He got deported from Canada - he said  
food was great in jail - they tried  
to change him w/ trying to over throw the  
govt - said Canadians w/ USPSsupp-000058



10/07/10  
⑨ of ⑨ JKT

Feltan/Meridian/Denver

JKT S/Scott A. 828-09

Did DM mention Heritage Front - no  
abortion clinic? - no

God city - no

Andy Straussmeier? - no

Tommy Gunn? - no

I'm sure about name Harrington

I use word assoc - Joey Harrington played  
football.

Archangel Michael? - We'd pray together  
DM would read scripture -

He would always go to the passage  
regency A.M. I gave him the bible -

DM highlighted passages - it had a  
faded bluish cover on it. I don't  
know if it got out of M.C.C.

Spent hours in barn

hiding spot - over hill - near retention

ditch - stormwater basin - near there had

hiding spot - used to hide from parents

there as kids - had things you missed

as kids they had spot they could physically

go into & hide - they ran away  
as kids & were not found

USPSupp-000059